

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATIONWIDE LIFE INSURANCE COMPANY,
a foreign corporation,

Plaintiff,

Case No. 2:11-cv-12422-AC-MKM

v.

Hon. Avern Cohn

WILLIAM KEENE, JENNIFER KEENE,
MONICA LYNN LUPILOFF, NICOLE RENEE
LUPILOFF and NICOLE RENEE LUPILOFF,
PERSONAL REPRESENTATIVE OF THE
ESTATE OF GARY LUPILOFF, DECEASED,

Defendants.

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and Nicole Lupiloff Personal Representative
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**DEFENDANTS WILLIAM KEENE & JENNIFER KEENE'S
WITNESS LIST**

DEFENDANTS WILLIAM KEENE & JENNIFER KEENE'S WITNESS LIST

Now come the Defendants William Keene and Jennifer Keene, and for their preliminary witness list, present the following witnesses, with annotations, who may be called to testify at time of trial. Where annotations are provided, this information will not be, and is not to be construed as, all inclusive. Defendant will amend this witness list as additional information becomes available during the course of discovery in this litigation.

1. William Keene - Defendant
2. Jennifer Keene - Defendant
3. Nicole Renee Lupiloff - (Adverse) Defendant, Lay Witness
4. Monica Lynn Lupiloff - (Adverse) Defendant, Lay Witness
5. Employees, agents, and representatives of Plaintiff, Nationwide Life Insurance Company (ADVERSE), including but not limited to:
 - a. Current policy representatives;
 - b. All past policy representatives, supervisors, and investigators;
 - c. Any agent, employee or representative of Nationwide Life Insurance Company, whose name appears in the policy file related to Gary Harmon Lupiloff including but not limited to any and all documents/e-communications/e-files/e-mails maintained by or on behalf of the Plaintiff.
 - d. Any individual whose name appears in the Life Insurance documentation of Nationwide Life Insurance Company and/or who have knowledge pertaining Defendants Keene's claims.
 - e. Mary Elizabeth (Betsy) Reich - Agent
 - f. Abby Tedeschi - Claims Examiner
 - g. Rachel Santino - Claims Examiner
 - h. Joe Case
 - i. Thomas Barnes
 - j. Charles Cordle
 - k. Debra Carpenter
 - l. Leigh Ann Bruno
 - m. Kristie Voltz
 - n. Peggy Bezy - SIU Intelligence Operation

- o. Judy Walker - SIU Intelligence Operation
 - p. Karen Brown
 - q. Marya J. Weisling
 - r. National Insurance Crime Bureau
- 6. Family, friends and acquaintances of Defendants [Lay Witnesses] who will testify as to their observations and knowledge of the Keenes, including but not limited to:
 - a. Diane Keene - William Keene's stepmother
 - b. Larry Baker - Jennifer Keene's father
 - c. Sue Ann Smith - Defendants Neighbor
 - d. Jodi Bullinger - Defendants Neighbor
- 7. Mary Columbo - Babysitting at 607 Giraud, Royal Oak (Gary Harmon Lupiloff's Neighbor) on the day of the subject incident
- 8. Bethany Polanski - Nanny for Gary Harmon Lupiloff's Neighbor at 2717 Ardmore, was present on the date of the subject incident
- 9. Ryan & Rolondo - Construction Workers
- 10. Royal Oak Police Department
221 E 3rd Street
Royal Oak, MI 48067
(248) 246-350
 - a. Perry Edgell
 - b. Frank Bonnette
 - c. Deputy Chief Gordon Young
 - d. "Patterson"
- 11. CNS Investigations (or CNSPI)
25101 Telegraph Road
Southfield, MI 48033
(248) 330-9696
 - a. Investigator Bob Cantlon
 - b. Investigator Jeff Valdez
- 12. Gary Harmon Lupiloff's creditors, and Custodian of the Records for the same:
 - a. Internal Revenue Service
 - b. Andra Rush on behalf of Lindahl Gross Lievois, PC
 - c. Beneficial Customer Service
 - d. Beverly Mollison
 - e. Brian Chaness on behalf of Neal Chaness
 - f. Capital One
 - g. CitiBank
 - h. Academy Collection Service on behalf of CitiBank
 - i. CitiFinancial

- j. Countrywide Funding Corp.
 - k. Debra Katz
 - l. Donal Moore
 - m. First of America Bank on behalf of Kevin M. Chudler
 - n. First USA Bank on behalf of Allied Interstate, Inc.; LVNV Funding; Northland Group, Inc.; Resurgent Capital Services; Sherman Acquisitions, LLC
 - o. Harvey Fink on behalf of Steven Lefkowsky
 - p. HSBC Card Services
 - q. Jaguar Credit on behalf of National Bankruptcy Center
 - r. John Lauri on behalf of Diamond Info Products
 - s. Kassab Enterprises on behalf of Thomas Strauch
 - t. Mark L. Nelson
 - u. Nordstrom Bank
 - v. Robert Scafuri
 - w. Robert Stewart on behalf of Thav Gross Steinway & Bennett, PC
 - x. Saks Fifth Avenue
 - y. Sherman Acquisitions, LLC
 - z. Thaddeus Stawick
 - aa. William Mazer on behalf of Gary T. Stremers
 - bb. Marc A. Goldman & Associates
13. Custodian of the Records for all entities listed herein, as well as:
- a. Oakland County Prosecutor's Office
 - b. Mad Advertising & Marketing, LLC
 - c. Screen Source Media
 - d. Church Hill Community Center
 - e. Comcast
 - f. AT&T
 - g. Verizon Wireless
 - h. Busch's Grocery Store
 - i. UMHS Child Care Center
 - j. Child Health Assoc
14. All witnesses identified by Defendant in any witness list, or discovery response, whether or not called to testify at time of trial.
15. Rebuttal witnesses.
16. Any and all persons having relevant knowledge concerning Defendants Keenes' employment, and the custodian of the records of the same.
17. Any witness necessary to provide foundation testimony for any testimony or tangible evidence offered in evidence in this action.
18. Witnesses as become known in the course of discovery.

19. All individuals whose names appear in responses to discovery requests by any party, deposition transcripts, and/or reports by any "experts" listed by any party in this action, including but not limited to:
- a. Erich Speckin - Co-Defendants Lupiloff's Hand Writing "Expert"
 - b. Stacy Mollison - Co-Defendants Lupiloffs' Stepmother
 - c. Detective Don Swiatkoski
 - d. Prosecutor John Petrefessa
 - e. Marlene Lupiloff - Deceased's Sister
 - f. Marion Lupiloff - Deceased's Mother
 - g. Stephanie Bowman - Deceased's Girlfriend
 - h. Lori Paxton-Blake - Deceased's Girlfriend at the time the policy was executed
 - i. Mary Kay Shaw - Deceased's Secretary who was near or at the scene
 - j. Stacy Levin - Deceased's Third Wife
 - k. Deborah Holtz - Deceased's Second Wife and mother of Co-Defendants Lupiloff
20. Plaintiff reserves the right to supplement this witness list as discovery continues.

Dated: November 7, 2013

Respectfully submitted:

s/John H. Bredell
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P36577

CERTIFICATE OF SERVICE

I hereby certify that on November 7, 2013, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

s/John H. Bredell
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